



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

Via Electronic Mail and U.S. Postal Service Mail

May 30, 2012

Ms. Angela Risdon
Environmental Operation Supervisor
EO - Shared Facilities - North
Pacific Gas and Electric Company
350 Salem Street
Chico, California 95928

Re: Polychlorinated Biphenyls (PCBs), Toxic Substances Control Act – Pacific Gas and Electric Company Additional Confirmation Soil Sampling and Soil Removal Work Plan in Response to USEPA Region 9 Comments on “Proposed Modifications to Soil Analysis in the Sampling and Analysis Plan for Transformer Oil Release, 21690 Highway 299, Del Loma, California” (SAP) Prepared by ARCADIS U.S., Inc. and Dated May 9, 2012

Dear Ms. Risdon:

On behalf of Pacific Gas & Electric (PG&E), ARCADIS U.S., Inc. (ARCADIS) submitted the subject SAP dated May 9, 2012. We appreciate ARCADIS submitting the SAP which proposes additional remedial soil excavations and sampling at the Del Loma property impacted by releases of transformer oil containing polychlorinated biphenyls (PCBs).¹ The property owner's chicken flock became contaminated with PCBs (original flock). PG&E reported this release to USEPA in May 2011 and subsequently, excavated PCB impacted soil from the area immediately impacted by the release.

USEPA is approving the SAP with conditions under the Toxic Substances Control Act (TSCA) regulations in 40 CFR 761.61(c). These conditions include chicken egg testing to address uncertainties in the potential for residual PCB concentrations in soils at the property to impact the new chicken flock that PG&E supplied to the property owner. In addition, the property owner has requested that eggs from the chicken flock supplied by PG&E be tested as well as eggs from chickens remaining from original flock.

In August 2011, USEPA required testing of eggs and fat from the PCB-exposed chicken flock (original flock) and the testing results demonstrated the eggs were not safe for human consumption. Based on that information, in its December 14, 2011 letter USEPA required that eggs from the original flock and second generation chickens be tested to determine if the eggs would be safe for human consumption. If safe for human consumption, USEPA would have determined that additional egg testing would not have been necessary; and therefore, additional soil remediation also would not have been necessary. The required second round of chicken egg testing was not conducted.

¹ A pole-mounted PCB-contaminated transformer released oil containing 283 milligram/kilogram (mg/kg) PCBs, contaminating soils and other materials near the release area.

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In April 2012, PG&E and the property owner decided to euthanize the original chicken flock except for two chickens. PG&E has supplied the property owner with a new chicken flock. However, uncertainties remain as to whether residual concentrations of PCBs remaining in soils at the property could potentially impact the new chicken flock and their eggs. Therefore, USEPA is approving the SAP under certain conditions including that eggs from the new flock and eggs from the original flock be tested. USEPA will use the egg testing data to determine if the eggs are safe for consumption and if PG&E's soil remediation efforts at the property have resulted in residual PCB concentrations that do not adversely impact the chickens and their eggs.

Conditions of Approval

USEPA is approving the SAP under the TSCA regulations in 40 CFR 761.61(c).

1. **USEPA December 14, 2011 letter.** Sampling and analysis of soils, rocks, and certain materials at the impacted property must be conducted consistent with USEPA's recommendations in the December 14, 2011 letter.
2. **Increment samples.** PG&E/ARCADIS shall collect 30 to 50 soil increments from each decision unit and not 20 increments from each unit as proposed in the SAP. Soil characterization and cleanup verification sampling must be conducted prior and after excavation, respectively at each decision unit. Increment sample locations for characterization and cleanup verification within each decision unit must be depicted in a sampling grid(s).
3. **Sampling grid size.** Within 3 days after the date of this approval submit the sampling grid for use in collecting soil increment samples for characterization and cleanup verification.
4. **Soil sample analysis and detection limits.** The PCB Aroclor analysis should be conducted using a detection limit less than 0.089 ppm. This PCB concentration is the California Department of Toxic Substances Control health screening level for PCBs in soils. The detection limit for PCB congeners must be lower than the USEPA Regional Screening Levels for dioxin-like PCB congeners for a residential exposure scenario.
5. **Retaining rock walls.** The rocks in the retaining rock wall must be sampled to determine if PCBs are present and to determine applicable disposal requirements. The enclosed Standard Operating Procedure for Sampling Porous Surfaces should be used to sample the rock material for PCB analysis. The rocks to be sampled include the very large landscaping rock in addition to the rocks in the retaining rock wall. Under "Proposed Additional Soil Removal" the retaining rock wall is described as extending approximately 10 feet to the north and south of the initial excavation.
6. **Off-site disposal of soil contaminated with PCBs.** The in-situ soil PCB concentration must be used to select the off-site disposal facility and not the concentration of PCBs in soil from the excavation that has been stockpiled.

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7. **Site characterization, cleanup, and decontamination wastes.** The wastes described under “Proposed Handling of Investigation Derived Waste” must be segregated consistent with waste categories in 40 CFR 761.61(a)(5)(v). Decontamination fluids must be disposed of at their original PCB concentration in accordance with 40 CFR 761.79(g). Decontamination of movable equipment, tools, and sampling equipment must be consistent with the requirements in 40 CFR 761.79(c)(2), 761.79(e), and 761.79(f).
8. **Sampling of eggs from the new chicken flock and chickens remaining from the original flock.** PG&E must sample the eggs from the chicken flock that PG&E supplied to the property owner (new chicken flock) and from those chickens remaining from the flock originally owned by the property owner and present at the site during the transformer release (original flock). This sampling must occur immediately after the chickens begin to lay eggs. Egg sampling and analysis must conform to the conditions in USEPA’s July 20, 2011 letter approving PG&E’s June 24, 2011 “Sampling and Analysis Plan for Transformer Oil Release 21690 Highway 299, Del Loma, California.”

Based on the egg analysis results for PCB congeners and Aroclors, USEPA will make recommendations to the property owner as to whether additional egg testing would be necessary.

The property owner has requested that eggs from the new flock be tested within (1) six months after the new chicken flock starts laying eggs and (2) one year after the new flock has been at his property. This egg testing schedule requested by the owner also applies to chickens remaining from the original flock.

9. **Revised health risk assessment.** PG&E must confer with USEPA on the revisions to the Health Risk Assessment (HRA). The HRA revisions will need to address the results of the egg testing required in Condition 8 above in addition to the results of soil analyses. USEPA will use the HRA in evaluating whether or not residual PCB concentrations at the property present an unreasonable risk of injury to health.
10. **Rocks and other landscaping materials to be removed from the cleanup site and replaced by PG&E.** Materials to be removed from the cleanup site at the property must be properly tested for PCBs. The concentration of PCBs, if present, cannot exceed PCB levels acceptable for unrestricted use. Refer to 40 CFR 761.30(u).


This conditional approval does not relieve PG&E and ARCADIS from complying with all other applicable federal, state, and local regulations and permits.

In addition to the above, we have reviewed the information that PG&E submitted for the pole transformer that failed at the Del Loma property and will be contacting PG&E with questions on that information.

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We appreciate PG&E's efforts in preparing the sampling and analysis plan being conditionally approved herein; and look forward to PG&E's implementation of the plan. If you have any questions concerning this approval, please call Carmen D. Santos at 415.972.3360. Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Scott", with a stylized flourish at the end.

Jeff Scott
Director
Waste Management Division

Enclosures (1)

Cc with enclosure via e-mail only:

Ann Conner, PG&E
Michael Charlton, property owner
Arlene Kabei, USEPA R9
Steve Armann, USEPA R9
John Beach, USEPA R9
Patrick Wilson, USEPA R9
Carmen Santos, USEPA R9